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10 Attorneys for Defendant,
Pioneer Credit Recovery, Inc.

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA
13

14 STEPHEN SCHNEIDER,

15 Plaintiff,

16 vs.

17 PIONEER CREDIT RECOVERY,

18 Defendant.

Case No: 2:18-cv-00123-APG-PAL

**UNOPPOSED MOTION OF EXTENSION
OF TIME TO FILE RESPONSIVE
PLEADINGS**

(First Request)

19 Pursuant to LR IA 6-1, Defendant Pioneer Credit Recovery, Inc. ("PCR") respectfully requests
20 the Court allow PCR an additional twenty-one (21) days to file pleadings in response to the Complaint.
21 In support of said motion, PCR avers as follows:

22 1. PCR was served with the Complaint on January 26, 2018. Per Fed. R. Civ. P.
23 12(a)(1)(A)(i), its answer is due on or before February 16, 2018.

24 2. PCR is compiling and counsel for PCR is awaiting receipt of additional file materials
25 in order to evaluate the claims and defenses and prepare responsive pleadings.

26 3. Accordingly, PCR respectfully requests the Court allow an additional twenty-one (21)
27 days or through March 9, 2018 to file responsive pleadings.

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4. This motion is timely in that the original time has not expired. This is PCR's *first* extension request and PCR counsel has conferred with counsel for plaintiff and represents that counsel has no objection to this request.

WHEREFORE, PCR moves this Court to enter an Order allowing PCR an extension of time to file responsive pleadings through March 9, 2018.

DATED this 14 day of February, 2018.

LINCOLN, GUSTAFSON & CERCOS, LLP

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Attorneys for Defendant,

Pioneer Credit Recovery, Inc.

Finding good cause shown,

IT IS SO ORDERED:

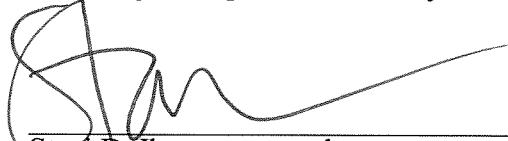
Judge Tygo A. Feen

Judge

Dated: February 23, 2018

CERTIFICATE OF SERVICE

I certify that on this 14th day of February, 2018, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

A handwritten signature in black ink, appearing to read 'Staci D. Ibarra', is written over a horizontal line.

Staci D. Ibarra, an employee
of the law offices of
Lincoln, Gustafson & Cercos, LLP